

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: DANIEL PRODUCTS CO.
400 CLAREMONT AVE.
JERSEY CITY, N.J.

EPA I.D. NUMBER:
NJD001340686

COMPANY ADDRESS:

COMPANY CONTACT OR OFFICIAL:

AL NEVIN

INSPECTOR'S NAME:

WAYNE HOWITZ

TITLE:

SAYS IT

BRANCH/ORGANIZATION:

N.J.D.E.P.
BUREAU OF HAZARDOUS WASTE

CHECK IF FACILITY IS ALSO A TSD
 FACILITY ☒

DATE OF INSPECTION:

09-22-81

YES NO DON'T KNOW

(1) Is there reason to believe that the facility has hazardous waste on site? X — —

a. If yes, what leads you to believe it is hazardous waste?
 Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

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 NEW YORK, N.Y. 10007
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YES	NO	DON'T KNOW
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- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

—	<u>X</u>	—
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Please explain:

- c. Identify the hazardous wastes that are on-site, and estimate-approximate quantities of each.

8-55 gallons drums of spent solvent

- d. Describe the activities that result in the generation of hazardous waste.

- (2) Is hazardous waste stored on site?

<u>X</u>	—	—
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- a. What is the longest period that it has been accumulated?

JUNE 1981

- b. Is the date when drums were placed in storage marked on each drum?

YES

<u>X</u>	—	—
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- (3) Has hazardous waste been shipped from this facility since November 19, 1980?

—	<u>X</u>	—
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- a. If "yes," approximately how many shipments were made?

- 3 -

- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980?

- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?

—	<u>X</u>	—
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- b. If "no" or "don't know," please elaborate.

YES	NO	DON'T KNOW
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c. Does each manifest (or a representative sample) have the following information?

- a manifest document number X
- the generator's name, mailing address, telephone number, and EPA identification number X
- the name, and EPA identification number of each transporter X
- the name, address and EPA identification number of the designated facility and an alternate facility, if any: X
- a description of the wastes (DOT) X
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle X
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA X

(5) Were there any hazardous wastes stored on site at the time of the inspection? X

a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? X

b. If not properly packaged or in secure tanks, please explain.

c. Are containers clearly marked and labelled? X

d. Do any containers appear to be leaking? X

e. If "yes," approximately how many?

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year?

___ NIA ___

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?

X ___

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments.

* The effective date for this requirement is March 1, 1982.

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: DANIEL PRODUCTS CO. EPA I.D. Number:
COMPANY ADDRESS: 346 CLAREMONT AVE NSD001340686
JERSEY CITY N.J.

COMPANY CONTACT OR OFFICIAL: 1) AL NEVIN OTHER ENVIRONMENTAL PERMITS HELD
2) DENNIS KELEMEN BY FACILITY: ☐ NPDES
TITLE: 1) PLANT MANAGER ☐ AIR
2) ASSISTANT PLANT MANAGER ☐ OTHER
INSPECTOR'S NAME: WAYNE HOWITZ DATE OF INSPECTION: 9-22-81

BRANCH/ORGANIZATION: N.J.D.E.P. TIME OF DAY INSPECTION TOOK PLACE:

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste?
Check appropriate box:

☐ Company admits that its waste is hazardous during the inspection.

☐ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

YES NO DON'T
KNOW

b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

 X

Please explain:

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AGENCY
NEW YORK, N.Y. 10007

VISUAL OBSERVATIONS

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
(5) <u>SITE SECURITY</u> (§265.14)			
a. Is there a 24-hour surveillance system?	<u>X</u>	___	___
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	<u>X</u>	___	___
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	<u>X</u>	___	___
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	<u>X</u>	___	___
a. If "YES", what are the approximate quantities?			
			<u>8 - 55 gallon drums.</u>
b. If "YES", have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	<u>X</u>	___	___
c. If "YES", explain			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	<u>X</u>	___	___
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	<u>X</u>	___	___
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	<u>X</u>	___	___
- damage the structural integrity of the device or facility containing the waste?	<u>X</u>	___	___
- threaten human health or the environment?	<u>X</u>	___	___

Please explain your answers, and comment if necessary.

- e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
- an internal communications or alarm system?	<u> x </u>	<u> </u>	<u> </u>
- a telephone or other device to summon emergency assistance from local authorities?	<u> x </u>	<u> </u>	<u> </u>
- portable fire equipment?	<u> x </u>	<u> </u>	<u> </u>
- adequate aisle space?	<u> x </u>	<u> </u>	<u> </u>
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	<u> x </u>	<u> </u>	<u> </u>

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain. yes.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? N/A

 N/A

If you have, please comment, as appropriate.

(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. x

b. Do you believe that operation of this facility may affect groundwater quality? x

c. If "YES", explain.

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? x

a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?

YES NO DON'T
KNOW

- the generator's name, mailing address, telephone number, and EPA identification number N/A
- the name, and EPA identification number of each transporter N/A
- the name, address and EPA identification number of the designated facility and an alternate facility, if any; N/A
- a DOT description of the wastes N/A
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle N/A
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA N/A

d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain. N/A

(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13) X

a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?

(You may check more than one)

Waste characteristics vary _____

All wastes are basically the same X

Company treats all waste as hazardous _____

Don't Know _____

b. Does hazardous waste come to this facility from off-site sources? X

c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest? N/A

(12) INSPECTIONS (§265.15)

a. Does the facility have a written inspection

(13) PERSONNEL TRAINING (§265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? X
- type and amount of training to be given to personnel in jobs related to hazardous waste management? X
- actual training or experience received by personnel? X

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste?
(§265.51)

a. Does the plan describe arrangements made with local authorities? X b. Has the contingency plan been submitted to local authorities? X How do you know? NO PLANc. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? X d. Does the plan have a list of what emergency equipment is available? X e. Is there a provision for evacuating facility personnel? X f. Was an Emergency Coordinator present or on call at the time of the inspection? X

(15) Does the owner/operator keep a written operating record with: (§265.73)

N/A

- a description of wastes received with methods and dates of treatment, storage or disposal? N/A
- location and quantity of each waste?
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?

Detailed operating summary reports and documentation

- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?

— X —

- a description of the steps necessary to decontaminate facility equipment during closure?

— X —

- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?

— X —

b. What is the anticipated date for final closure?

— — X

tc. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?

— N/A —

d. Does the written post-closure plan include:

- a description of planned groundwater monitoring activities and their frequencies during post-closure?

— N/A —

- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?

— N/A —

- the name, address and phone number of a person or office to contact during post-closure?

— — —

*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?

— X —

*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)

— X —

— N/A —

*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)

a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste management area?

— N/A —

b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient

SITE-SPECIFIC

please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

<u>STORAGE</u>	<u>TREATMENT</u>	<u>DISPOSAL</u>
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	<div style="display: flex; justify-content: space-around;"> <u>YES</u> <u>NO</u> <u>DON'T KNOW</u> </div>
	Other _____	

CONTAINERS (\$265.170)

1. Are there any leaking containers?
If "YES", explain. X — —
2. Are there any containers which appear in danger of leaking?
If "YES", explain. — X —
3. Do wastes appear compatible with container materials? X — —
4. Are all containers closed except those in use? X — —
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak? — X —
6. How often does the plant manager claim to inspect container storage areas? EVERY DAY

	<u>TANKS (\$265.190)</u>	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
1. Are there any leaking tanks? If "YES", explain.		—	—	—
2. Are there any tanks which appear in danger of leaking. If "YES", explain.		—	—	—
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.		—	—	—
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?		—	—	—
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?		—	—	—
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.		—	—	—
7. How often does the plant manager claim to inspect container storage areas?				
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.		—	—	—
9. What is the approximate number and size of tanks containing hazardous wastes?				

SURFACE IMPOUNDMENTS (\$265.220)

1. Is there at least 2 feet of freeboard in the impoundment?	—	—	—
2. Do all earthen dikes have a protective cover to preserve their structural integrity?	—	—	—

YESNODON'T
KNOW

4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics?
If "YES", explain.

5. Are there any leaks, failures or is there any deterioration in the impoundments?
If "YES", explain.

6. Give the approximate size of surface impoundments (gallons or cubic feet).

WASTE PILES (\$265.250)

1. Is the waste pile protected from wind erosion?

a. Does it appear to need such protection?

b. Explain what type of protection exists.

2. Does it appear that incompatible wastes are being stored in the same waste pile?
If "YES", explain.

3. Is leachate run-off from a pile a hazardous waste?
If "YES", explain this determination and answer (a) and (b) below.

a. Is the pile placed on an impermeable base that is compatible with the waste?

b. Is the pile protected from precipitation and run-on?

4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite?
Please explain or indicate if no such wastes are present.

Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste?
Please explain.

YESNODON'T
KNOW

- *2. Is run-on diverted away from the active portions of the land treatment facility?
- *3. Is run-off collected?
4. Are food chain crops being grown on the facility property?
- a. If "YES", can the facility operator document that arsenic, lead and mercury:
- will not be transferred to the crop or ingested by food chain animals or
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.
- b. Has notification of the growing of the food chain crops been made to the Regional Administrator?
5. Is there a written and implemented plan for unsaturated zone monitoring?
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?
7. Do the closure and post-closure plans address:
- a. control of migration of hazardous wastes into the groundwater?
- b. control of run-off, release of airborne particulate contaminants?
- c. compliance with requirements for the growth of food-chain crops (if they are present)?
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition?
 If "YES", explain.
9. Are incompatible wastes placed in the same land treatment area?
 If "YES", explain.
10. What is the area of the land receiving hazardous waste treatment?

3. Is waste which is subject to wind dispersal controlled?
Explain. _____
4. Does the owner/operator maintain a map with:
- the exact location and dimensions of each cell _____
 - the contents of each cell and approximate location of each hazardous waste type _____
5. Do the closure and post-closure plans address:
- control of pollutant migration via ground water? _____
 - control of surface water infiltration? _____
 - prevention of erosion? _____
6. Is ignitable or reactive waste treated before being placed in the landfill?
Explain how you know. _____
7. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell?
If "NO", explain. _____
8. Are bulk or non-containerized wastes containing free liquids placed in the landfill?
If "YES",
- a. Does the landfill have a liner which is chemically and physically resistant to the added liquid? _____
 - b. Is the waste treated and stabilized so that free liquids are no longer present? _____
- *9. Are containers holding liquid waste or waste containing free liquids placed in the landfill? _____
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills? _____

INCINERATORS AND THERMAL TREATMENT

(§§265.340 and 265.379)

YES NO DON'T
KNOW

1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?

2. Was hazardous waste being incinerated or thermally treated during your inspection?
If "YES", answer all following questions.
If "NO", answer only questions 3 and 7.

3. Has waste analysis been performed (and written records kept) to include:
 - heating value of the waste
 - halogen content
 - sulfur content
 - concentration of lead
 - concentration of mercury

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here ☐.

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?

5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:
 - waste feed
 - auxiliary fuel feed
 - air flow
 - incinerator temperature
 - scrubber flow
 - scrubber pH

- a. If "YES", what is being burned?
(only burning or detonation
of explosives is permitted)

- b. If open burning or detonation of explosives is taking
place, approximately what is the distance from the open
burning or detonation to the property of others?

YES NO DON'T
KNOW

6. Does the incinerator appear to be operating
properly? (Do emergency shutdown controls
and system alarms seem to be in good working
order?) Please explain.

___ ___ ___

- a. Is there any evidence of fugitive emissions?

___ ___ ___

7. Is the residue from the incinerator treated
by the owner as a hazardous waste?
Please explain.

___ ___ ___

8. What types of air pollution control devices (if any)
are installed on the incinerator?

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (\$265.400)

1. Does the treatment process system show any
signs of ruptures, leaks, or corrosion?
Please explain.

___ ___ ___

2. Is there a means to stop the inflow of
continuously-fed hazardous wastes?

___ ___ ___

3. Is there ignitable or reactive waste fed
into the treatment system?

___ ___ ___

If "YES", has it been treated or protected
from any material or conditions which may
cause it to ignite or react? If so,
explain how.

___ ___ ___

Are the incompatible wastes placed in
the same treatment process?
If "YES", explain.

___ ___ ___

5. Describe the treatment system at this facility.

RCRA INSPECTION REVIEW SHEET

Name of Facility - **DANIEL PRODUCTS CO.**

RCRA ID# - **NJD001340686**

Date of Inspection - **9-22-81**

Type of Inspection: **X**Generator

Transporter

XISD

Name of EPA/State Inspector - **WAYNE HOWITZ**

Findings of Inspection:

VIOLATIONS OF 40 CFR

265.15 (b) AND (d).

265.16 (d)

265.51

265.52 (c), (d), (e) AND (f)

265.53 (c)

265.112 (2)

265.142 (2)

Action(s) Taken:

Action(s) Recommended:

MR. NEVIN WAS INFORMED OF THE DEFICIENCIES

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